



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Beverly Eaves Perdue, Governor
Linda A. Carlisle, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

November 9, 2009

Frank Yelverton
Environmental Resources Section
US Army Corps of Engineers
69 Darlington Avenue
Wilmington, NC 28403-1343

Re: Potential North Carolina International Terminal (NCIT), Wilmington District Corps of Engineers
Reconnaissance Study (905(b) report), Brunswick County, ER 09-2525

We have reviewed the reports prepared by Risingwater Associates concerning environmental issues related to the above project. We concur that within the project area there are numerous cultural resources that may be affected by project implementation. These include archaeological remains, such as submerged shipwrecks and historic and prehistoric waterfront sites, as well as many standing structures of historic value.

Staff members of this division found that while this document recognized the direct impacts of channel dredging, indirect effects from this activity on cultural resources should also be considered. These relate to shoreline erosion and sediment loss of existing deposits in areas adjacent to the dredging project which have the potential to expose and disturb or destroy previously buried archaeological sites. We recommend that these potential impacts also be considered during the environmental assessment process.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800. In addition, the area is protected by North Carolina legislation (G.S. 121-22 to 28, Article 3: salvage of abandoned shipwrecks and other underwater archaeological materials on all bottoms from low water to one marine league seaward, and bottoms of other navigable waters). This law is supported by the Abandoned Shipwreck Act of 1987 (P.L. 100-298) which gives the state jurisdiction over a broad range of living and nonliving resources in state waters and submerged lands, including certain abandoned shipwrecks, which have been deserted and to which the owner has relinquished ownership rights with no retention.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579. In all future communication concerning this project, please cite the above-referenced tracking number.

Sincerely,

A handwritten signature in black ink that reads "Peter Sandbeck".

Peter Sandbeck